

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**CHAMBERS OF
JESSICA S. ALLEN
UNITED STATES MAGISTRATE JUDGE**

**MARTIN LUTHER KING COURTHOUSE
50 WALNUT STREET
NEWARK, NJ 07101
(973) 645-2580**

March 10, 2025

LETTER ORDER PURSUANT TO RULE 16.1 (PRO SE)

RE: CALDWELL v. TRANSWORLD SYSTEMS INC.

Civil Action No. 25-1557 (JKS)(JSA)

To All Parties:

The Court will conduct a **Telephonic Initial Scheduling Conference** before the Undersigned on **May 5, 2025 at 3:00 p.m.** The parties are instructed to dial 1-1-855-244-8681 and enter Access Code: 23024029552# at the time of the Conference. See Fed. R. Civ. P. 16.1 and L.Civ.R. 16.1(a).

The parties are advised that the early disclosure requirements of Fed. R. Civ. P. 26 will be enforced. Therefore, the parties shall immediately exchange the following information without a formal discovery request. These category descriptions are merely descriptive and not intended to modify FRCP 26(a)(1)(A).

- identities of individuals likely to have knowledge of discoverable facts,
- documents and things in the possession of counsel or the party, or a description thereof.
- insurance agreements in force, and
- computation of each category of damages including any documents or other evidentiary material under Rule 34.

At least fourteen (14) days prior to the conference scheduled herein, counsel and any unrepresented/pro se parties shall meet and confer pursuant to Fed. R. Civ. P. 26(f), **and shall submit a discovery plan to the Undersigned no later than APRIL 20, 2025. The discovery plan shall include (1) a brief than 72 hours prior to the Conference with the Court.** The discovery plan shall include (1) a brief summary of the claims and defenses; and (2) a proposed schedule for completing fact and expert discovery. The discovery plan may include a summary of the status of settlement negotiations. (THE DISCOVERY PLAN SHALL BE IN THE FORM ATTACHED AND SHALL BE SUBMITTED JOINTLY.)

At the conference, the Court will address scheduling of all motions. No motions, other than a motion under Fed. R. Civ. P. 12, shall be filed without prior leave of Court. If any motions have already been filed, please advise the Court immediately, in writing, regarding the nature of the motion and its present status. Counsel may submit unopposed applications for pro hac vice admission with my Chambers. Counsel is requested to obtain consent of any adversary prior to filing the application, advising both in the cover letter and proposed Order that counsel has consent. In addition, the party shall follow the requirements of L.Civ.R. 101.1(c) and submit a certification that states local counsel: (1) is a member of the New Jersey bar in good standing and lists all bars in which counsel is admitted and their contact information, (2) will be responsible for the conduct of the pro hac vice counsel, (3) will sign all pleadings and submissions and make all court appearances, and (4) will ensure that pro hac vice counsel will comply with L.Civ.R. 101.1(c). The certification shall also state whether or not the applicant has received the consent of opposing counsel. The certification of proposed pro hac vice counsel shall include said counsel's actual signature and state that counsel: (1) is a member of a bar in good standing and list all bars in which counsel is admitted and their contact information, (2) will submit to this Court's jurisdiction for discipline, (3) will pay the Clerk's fee, (4) will make payment to the client fund; and (5) will abide by Local Civil Rule 101.1(c).

At the conference with the Court, all parties who are not appearing pro se must be represented by counsel who shall have full authority to bind their client in all pretrial matters. Clients or persons with authority over the matter shall be available by telephone. See L. Civ.R. 16.1(a).

Pro se plaintiff(s) shall notify any party who hereafter enters an appearance of the above conference and forward to that party a copy of this Order.

The parties must advise this Court immediately if this action has been settled or terminated so that the above conference may be cancelled.

Failure to comply with the terms herein may result in the imposition of sanctions.

The Clerk of the Court shall mail a copy of this Order to Pro Se Litigants by regular U.S. mail.

SO ORDERED.

/s/ Jessica S. Allen

Jessica S. Allen

United States Magistrate Judge

cc: Hon. Jamel K. Semper, U.S.D.J.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

	:	Civil Action No.
	:	
Plaintiff(s),	:	Hon.
	:	
v.	:	JOINT DISCOVERY PLAN
	:	
	:	
Defendant(s).	:	

1. Set forth a factual description of the case. Include the causes of action and affirmative defenses asserted.

2. Have settlement discussions taken place? Yes _____ No _____

If so, when? _____

(a) What was plaintiff's last demand?

(1) Monetary demand: \$ _____

(2) Non-monetary demand: _____

(b) What was defendant's last offer?

(1) Monetary offer: \$ _____

(2) Non-monetary offer: _____

3. The parties [have _____ -have not _____] exchanged the information required by Fed. R. Civ. P. 26(a)(1). If not, state the reason therefor.

4. Describe any discovery conducted other than the above disclosures.

5. Generally, dispositive Motions cannot be filed until the completion of discovery. Describe any Motions any party may seek to make prior to the completion of discovery. Include any jurisdictional Motions and Motions to Amend.

6. The parties proposed the following:

(a) Discovery is needed on the following subjects:

(b) Should discovery be conducted in phases? If so, explain.

(c) Number of Interrogatories by each party to each other party: _____

(d) Number of Depositions to be taken by each party: _____

- (e) Plaintiff's expert report due on _____.
 - (f) Defendant's expert report due on _____.
 - (g) Motions to Amend or to Add Parties to be filed by _____.
 - (h) Dispositive motions to be served within _____ days of completion of discovery.
 - (i) Factual discovery to be completed by _____.
 - (j) Expert discovery to be completed by _____.
 - (k) Set forth any special discovery mechanism or procedure requested, including data preservation orders or protective orders:
 - (l) A pretrial conference may take place on _____
 - (m) Trial by jury or non-jury Trial?
 - (n) Trial date: _____.
7. Do you anticipate any discovery problem(s)? Yes _____ No _____ If so, explain.
8. Do you anticipate any special discovery needs (i.e., videotape/telephone depositions, problems with out-of state witnesses or documents, etc.)? Yes _____ No _____ If so, explain.
9. State whether this case is appropriate for voluntary arbitration (pursuant to L. Civ. R. 201.1 or otherwise), mediation (pursuant to L. Civ. R. 301.1 or otherwise), appointment of a special master or other special procedure. If not, explain why and state whether any such procedure may be appropriate at a later time (i.e., after exchange of pretrial disclosures, after completion of depositions, after disposition of dispositive motions, etc.).
10. Is this case appropriate for bifurcation? Yes _____ No _____
11. We [do _____ do not _____] consent to the trial being conducted by a Magistrate Judge.

Plaintiff(s)

Defendant(s)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**Prose (Non Prisoner)
Consent & Registration Form to Receive Documents Electronically**

Pursuant to Fed. R. Civ. P. 5(b), and Fed. R. Civ. P. 77(d), Local Civil Rule 5.2 and the Court's Electronic Case Filing Policies and Procedures, documents may be served through the court's transmission facilities by electronic means. Documents that are not permitted to be served electronically are pleadings that are to be served with process under Fed.R.Civ.P. 4.

I _____ hereby consent to receive service of documents and notice of electronic filings via the Court's electronic filing system to the extent and in the manner authorized by the above rules and waiving the right to receive notice by first class mail pursuant to Fed.R.Civ.P. 5(b)(2)(D) and Fed.R.Civ.P. 77(d).

Pursuant to Local Civil Rule 10.1, I will promptly notify the Court if there is a change in my personal data, such as name, address, and/or e-mail address. I will promptly notify the Court to request cancellation of electronic service.

Litigants who have consented to receive documents electronically will be sent a **Notice of Electronic Filing** via e-mail. Upon receipt of the notice, they are permitted **one "free look"** at the document by clicking on the hyperlinked document number. The one "free look" will expire 15 days from the date the notice was sent. After the "free look" is used or expires, the document can only be accessed through PACER (Public Access to Court Electronic Records.) It is recommended that litigants establish a PACER account. This can be accomplished by visiting the PACER web site at <http://pacer.psc.uscourts.gov>. PACER is an automated system that allows an individual to view, print, and download documents for a fee.

My e-mail address is: _____

My case number is: _____

Signature of Litigant

Mailing Address

City, State, Zip Code

Telephone Number

Date: _____